

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
FIRST GUARANTY MORTGAGE)	Case No. 22-10584 (CTG)
CORPORATION, <i>et al.</i> , ¹)	
)	(Jointly Administered)
Liquidating Debtors.)	
)	

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR HEARING ON
JANUARY 26, 2023 AT 3:00 P.M. (PREVAILING EASTERN TIME)
BEFORE THE HONORABLE CRAIG T. GOLDBLATT**

**AS NO MATTERS ARE GOING FORWARD, THE HEARING HAS BEEN
CANCELLED WITH THE COURT'S PERMISSION**

UNCONTESTED MATTERS WITH CNO OR COC:

1. Motion for Entry of an Order Further Extending Deadline Within Which Debtors May Remove Actions (Filed December 27, 2022) [Docket No. [735](#)]

Response Deadline: January 11, 2023 at 4:00 p.m.

Responses Received:

- A. None.

Related Documents:

- A. Certificate of No Objection (Filed January 24, 2023) [Docket No. [756](#)].
- B. Order Extending Deadline Within Which Debtors May Remove Actions (Signed January 24, 2023) [Docket No. [758](#)]

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors' mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

² **Amended items are shown in bold.**

Status: An Order has been entered.

CONTESTED MATTERS:

2. *Qui Tam* Plaintiff Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed December 13, 2022) [Docket No. [711](#)]

Response Deadline: January 24, 2023 at 4:00 p.m.

Responses Received

- A. **Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion to Compel the Production of Requested Insurance Documents (Filed January 24, 2023) [Docket No. [762](#)]**

Related Documents

- A. Notice of Hearing on Kari Crutcher's Motion To Compel The Production Of Requested Insurance Documents (Filed January 10, 2023) [Docket No. [749](#)]
- B. **Stipulation Adjourning Hearing (Filed January 25, 2023) [Docket No. [766](#)]**

Status: This matter is adjourned to a date to be determined.

3. *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed December 13, 2022) [Docket No. [712](#)]

Response Deadline: January 24, 2023 at 4:00 p.m.

Responses Received

- A. **Liquidating Trustee's Objection to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors' Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 24, 2023) [Docket No. [761](#)]**
- B. **Objection of B2 FIE XI LC AND LVS II SPE XXXIV LLC to *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors Confirmed Chapter 11 Plan to Allow her to File a Motion to Transfer her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 24, 2023) [Docket No. [763](#)]**

Related Documents

- A. Notice of Hearing on *Qui Tam* Plaintiff Kari Crutcher's Motion for Limited Relief from the Permanent Injunction of the Debtors Confirmed Chapter 11 Plan to Allow Her to File a Motion to Transfer Her *Qui Tam* Action to the District of Delaware and to Pursue the *Qui Tam* Action Against the Debtor as Nominal Defendant (Filed January 10, 2023) [Docket No. [750](#)]
- B. **Stipulation Adjourning Hearing (Filed January 25, 2023) [Docket No. [766](#)]**

Status: This matter is adjourned to a date to be determined.

FINAL FEE APPLICATIONS.

See **Exhibit A** attached hereto.

Related Documents

- A. Certification of Counsel Regarding Omnibus Order Approving Final Fee Applications of Certain Professionals (Filed January 24, 2023) [Docket No. [759](#)]
- B. **Certification of Counsel Regarding Order Approving in Part Final Fee Application of Pachulski Stang Ziehl & Jones LLP (Filed January 25, 2023) [Docket No. [767](#)]**

Status: The Court is reviewing the Final Fee Applications and will follow up with applicants as needed. The hearing with respect to the Office of the United States Trustee's informal objection to a portion of the Final Fee Application of Pachulski Stang Ziehl & Jones LLP is adjourned to a date to be determined.

Dated: January 26, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Laura Davis Jones

Laura Davis Jones (DE Bar No. 2436)
Timothy P. Cairns (DE Bar No. 4228)
Mary F. Caloway (DE Bar No. 3059)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19899 (Courier 19801)
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
tcairns@pszjlaw.com
mcalloway@pszjlaw.com

-and -

DENTONS US LLP

Samuel R. Maizel
Tania M. Moyron
601 S. Figueroa Street, #2500
Los Angeles, CA 90017
Telephone: (213) 623-9300
Email: samuel.maizel@dentons.com
tania.moyron@dentons.com

-and-

DENTONS US LLP

David F. Cook
1900 K Street, NW
Washington, DC 20006
Telephone: (202) 496-7500
Email: david.f.cook@dentons.com

*Counsel for Liquidating Debtors and Liquidating
Trustee*

EXHIBIT A

A. Dentons US LLP

1. First Monthly Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from June 30, 2022 through July 31, 2022 (Filed October 17, 2022) [D.I. [562](#)]
2. Certificate of No Objection (No Order Required) Regarding First Monthly Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from June 30, 2022 through July 31, 2022 (Filed November 10, 2022) [D.I. [682](#)]
3. Second Monthly Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from August 1, 2022 through August 31, 2022 (Filed November 23, 2022) [D.I. [693](#)]
4. Third Monthly Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2022 through September 30, 2022 (Filed November 30, 2022) [D.I. [697](#)]
5. Fourth Monthly Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2022 through October 31, 2022 (Filed December 2, 2022) [D.I. [700](#)]
6. Certificate of No Objection (No Order Required) Regarding Second Monthly Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from August 1, 2022 through August 31, 2022 (Filed December 15, 2022) [D.I. [714](#)]
7. Certificate of No Objection (No Order Required) Regarding Third Monthly Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from September 1, 2022 through September 30, 2022 (Filed December 22, 2022) [D.I. [728](#)]
8. Certificate of No Objection (No Order Required) Regarding Fourth Monthly Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from October 1, 2022 through October 31, 2022 (Filed December 27, 2022) [D.I. [734](#)]

9. Fifth Monthly and Final Fee Application of Dentons US LLP as Counsel for the Debtors and Debtors in Possession, for Allowance of Compensation and Reimbursement of Expenses for the Period from November 1, 2022 through November 6, 2022 and the Final Period from June 30, 2022 through November 6, 2022 (Filed January 4, 2023) [D.I. [741](#)]
10. Supplemental Declaration of Samuel R. Maizel in Support of the Fifth and Final Fee Application of Dentons US LLP (Filed January 24, 2023) [D.I. [757](#)]

B. Pachulski Stang Ziehl & Jones LLP

1. First Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the period from June 30, 2022 to July 31, 2022 (Filed December 20, 2022) [D.I. [715](#)]
2. Second Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the period from August 1, 2022 to August 31, 2022 (Filed December 20, 2022) [D.I. [716](#)]
3. Third Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the period from September 1, 2022 to September 30, 2022 (Filed December 21, 2022) [D.I. [719](#)]
4. Fourth Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the period from October 1, 2022 to November 6, 2022 (Filed December 21, 2022) [D.I. [721](#)]
5. Final Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the period from June 30, 2022 to November 6, 2022 (Filed December 21, 2022) [D.I. [725](#)]
6. Certificate of No Objection (No Order Required) Regarding Third Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the period from September 1, 2022 to September 30, 2022 (Filed January 12, 2023) [D.I. [752](#)]
7. Certificate of No Objection (No Order Required) Regarding Fourth Monthly Application for Compensation and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP, as Co-Counsel for the Debtors and Debtors in Possession, for the period from October 1, 2022 to October 31, 2022 (Filed January 12, 2023) [D.I. [753](#)]

C. Kurtzman Carson Consultants

1. First Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the period from July 1, 2022 to and Including July 31, 2022 (Filed September 13, 2022) [D.I. [436](#)]
2. Second Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the period from August 1, 2022 to and Including August 31, 2022 (Filed October 5, 2022) [D.I. [514](#)]
3. Certificate of No Objection (No Order Required) Regarding First Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the period from July 1, 2022 through July 31, 2022 (Filed October 6, 2022) [D.I. [515](#)]
4. Certificate of No Objection (No Order Required) Regarding Second Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the period from August 1, 2022 to and including August 30, 2022 (Filed October 28, 2022) [D.I. [621](#)]
5. Third Monthly Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the period from October 1, 2022 to and including, October 31, 2022 (Filed December 1, 2022) [D.I. [699](#)]
6. Final Fee Application of Kurtzman Carson Consultants LLC, as Administrative Advisor to the Debtors, for the period from June 30, 2022 to and Including November 6, 2022 (Filed December 21, 2022) [D.I. [724](#)]

D. Thompson Coburn Hahn & Hessen LLP

1. Combined First Monthly Fee Application of Thompson Coburn Hah & Hessen LLP, as Co-Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, *et al.*, for Compensation and Reimbursement of Expenses for the period from July 15, 2022 through August 31, 2022 (Filed October 19, 2022) [D.I. [576](#)]
2. Certificate of No Objection Regarding Combined First Monthly Fee Application of Thompson Coburn Hahn & Hessen LLP, as Co-Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, *et al.*, for Compensation and Reimbursement of Expenses for the Period from July 15, 2022 through August 31, 2022 (Filed November 11, 2022) [D.I. [685](#)]
3. Second Monthly Fee Application of Thompson Coburn Hah & Hessen LLP, as Co-Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, *et al.*, for Compensation and Reimbursement of Expenses for the period from September 1, 2022 through September 30, 2022 (Filed November 18, 2022) [D.I. [689](#)]

4. Certificate of No Objection Regarding Second Monthly Fee Application of Thompson Coburn Hahn & Hessen LLP, as Co-Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, et al., for Compensation and Reimbursement of Expenses for the Period from September 1-30, 2022 (Filed December 14, 2022) [D.I. [713](#)]
5. First Interim and Final Fee Application of Thompson Coburn Hahn & Hessen LLP for Allowance of Compensation and Reimbursement of Expenses from July 15, 2022 through November 6, 2022 (Including Third Monthly Period of October 1, 2022 – November 6, 2022) (Filed December 21, 2022) [D.I. [726](#)]
6. Certificate of No Objection Regarding Committee Professionals' Final Fee Applications for the Period from July 15, 2022 through November 6, 2022 (Filed January 20, 2023) [D.I. [754](#)]

E. Blank Rome LLP

1. Combined First Monthly Fee Application of Blank Rome LLP, Delaware Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, *et al.*, for Compensation and Reimbursement of Expenses for the Period from July 15, 2022 through August 31, 2022 (Filed October 6, 2022) [D.I. [517](#)]
2. Certificate of No Objection Regarding Combined First Monthly Fee Application of Blank Rome LLP, Delaware Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation et al., for Compensation and Reimbursement of Expenses for the Period from July 15, 2022 through August 31, 2022 (Filed November 1, 2022) [D.I. [663](#)]
3. Second Monthly Fee Application of Blank Rome LLP, Delaware Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, *et al.*, for Compensation and Reimbursement of Expenses for the Period September 1, 2022 to September 30, 2022 (Filed November 1, 2022) [D.I. [664](#)]
4. Certificate of No Objection Regarding Second Monthly Fee Application of Blank Rome, LLP, Delaware Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, et al., for Compensation and Reimbursement of Expenses for the Period from September 1, 2022 Through September 30, 2022 (Filed December 7, 2022) [D.I. [706](#)]
5. Third Monthly Fee Application of Blank Rome LLP, Delaware Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, *et al.*, for Compensation and Reimbursement of Expenses for the Period October 1, 2022 to November 6, 2022 (Filed December 7, 2022) [D.I. [707](#)]
6. Final Fee Application of Blank Rome LLP, Delaware Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, *et al.*, for Compensation and Reimbursement of Expenses for the Period from July 15, 2022 through November 6, 2022 (Filed December 21, 2022) [D.I. [720](#)]

7. Certificate of No Objection Regarding Third Monthly Fee Application of Blank Rome LLP, Delaware Counsel to the Official Committee of Unsecured Creditors of First Guaranty Mortgage Corporation, et al., for Compensation and Reimbursement of Expenses for the Period from October 1, 2022 Through November 6, 2022 (Filed December 29, 2022) [D.I. [736](#)]
8. Certificate of No Objection Regarding Committee Professionals' Final Fee Applications for the Period from July 15, 2022 through November 6, 2022 (Filed January 20, 2023) [D.I. [754](#)]

F. Berkeley Research Group, LLC

1. First Monthly Application of Berkeley Research Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor to the Official Committee of Unsecured Creditors During the Period from July 20, 2022 through August 31, 2022 (Filed October 20, 2022) [D.I. [580](#)]
2. Certificate of No Objection Regarding First Monthly Fee Application of Berkeley Research Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor to the Official Committee of Unsecured Creditors During the Period from July 20, 2022 Through August 31, 2022 (Filed November 11, 2022) [D.I. [686](#)]
3. Second Monthly Application of Berkeley Research Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor to the Official Committee of Unsecured Creditors During the Period from September 1, 2022 to September 30, 2022 (Filed December 5, 2022) [D.I. [702](#)]
4. Third Monthly and Final Application of Berkeley Research Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor to the Official Committee of Unsecured Creditors During the Period from October 1, 2022 through November 6, 2022 (Filed December 21, 2022) [D.I. [723](#)]
5. Certificate of No Objection Regarding Second Monthly Fee Application of Berkeley Research Group, LLC for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Financial Advisor to the Official Committee of Unsecured Creditors During the Period From September 1, 2022 Through September 30, 2022 (Filed January 5, 2023) [D.I. [743](#)]
6. Certificate of No Objection Regarding Committee Professionals' Final Fee Applications for the Period from July 15, 2022 through November 6, 2022 (Filed January 20, 2023) [D.I. [754](#)]

G. Strategic Mortgage Finance Group, LLC

1. First and Final Application of Strategic Mortgage Finance Group, LLC as Investment Banker to the Debtors for the period from September 8, 2022 to November 6, 2022 (Filed December 21, 2022) [D.I. [722](#)]